

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
AT Greenville TN.

Randall Wade Cooper)

_____)

)
(Enter above the NAME of the

plaintiff in this action.))

v.
Steve Lawson)

Chad Nave)

Corey Loftis)

Emory Bryant)

Mario Santos)

EREC Geren)

(Enter above the NAME of each

defendant in this action.))

COMPLAINT FOR VIOLATION OF CIVIL RIGHTS

(42 U.S.C. Section 1983)

I. PREVIOUS LAWSUITS

A. Have you begun other lawsuits in state or federal court dealing with the same facts involved in this action or otherwise relating to your imprisonment? YES () NO (X)

B. If your answer to A is YES, describe the lawsuit in the space below. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper, using the same outline.)

1. Parties to the previous lawsuit:

Plaintiffs: _____

Defendants: _____

2. COURT: (If federal court, name the district; if state court, name the county):

3. DOCKET NUMBER: _____

4. Name of Judge to whom case was assigned: _____

5. Disposition: (For example: Was the case dismissed? Was it appealed? Is it still pending?) _____

6. Approximate date of filing lawsuit: _____

7. Approximate date of disposition: _____

II. PLACE OF PRESENT CONFINEMENT: Bradley County Jail

A. Is there a prisoner grievance procedure in this institution? YES () NO (X)

B. Did you present the facts relating to your complaint in the prisoner grievance procedure? YES () NO (X)

C. If your answer is YES,

1. What steps did you take? _____

2. What was the result? _____

D. If your answer to B is NO, explain why not. _____

E. If there is no prison grievance procedure in the institution, did you complain to the prison authorities? YES (X) NO ()

F. If your answer is YES,

1. What steps did you take? Talked with Mr. Steve Lawson
about events on Oct 17 2018 specifically officers conduct.

2. What was the result? He laughed at me

III. PARTIES

(In item A below, please your name in the first blank and place your present address in the second blank. Do the same for any additional plaintiffs.)

A. Name of plaintiff: Randall Wade Cooper

Present address: 2290 Blythe Ave SE Cleveland TN 37311

Permanent home address: N/A

Address of nearest relative: Robin Cooper 2315 3rd ST Dalton GA 30721

(In item B below, place the FULL NAME of the defendant in the first blank, his official position in the second blank, and his place of employment in the third blank. Use item C for the additional names, positions, and places of employment of any additional defendants.)

B. Defendant: Steve Lawson

Official position: Sheriff Bradley County

Place of employment: Bradley County

C. Additional defendants: Chad Nave, Corey Loftis,
Emory Bryant, Mario Santos, Eric
Geron, Bradley County Sheriff Dept
Bradley County TN. 37311

IV. STATEMENT OF CLAIM

(State here as briefly as possible the FACTS of your case. Describe how EACH defendant is involved. Include also the names of other persons involved, dates and places. DO NOT give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Use as much space as you need. Attach extra sheets, if necessary.)

Following arrest Oct. 17 2018 Sheriff Steve Lawson and I spoke about officers using excessive force in Oct. 17's arrest. Naming specific

conduct, which was recorded on video, I requested him to take appropriate action in this matter. He laughed at me. Following up with him and requesting legal aid on the Kiosk failed to result in steps taken toward justice. On 9/24/2019 in Bradley Co. jail I was told^{b†} "Sheriff Lawson" he would check into it"
Relating these events on 11/8/2019 to Honorable Judge Donaghy I was advised to file a Federal complaint. Sheriff Lawson's refusal to take appropriate action - which is his duty as Bradley Co's Sheriff - against such blatant use of excessive force has resulted in my 5th amendment Right of Due Process of the law being deprived under color of state law. This fact is supported by jail footage, Kiosk requests, conversations with Sheriff Lawson, arrest video and incident reports, testimony of officer Nave in court 1/7/2019 at preliminary hearing in session court, and other unnamed evidence.

ON OCT. 17 at approx. 12:00pm in attempted traffic stop I was pursued by Bradley Co. units. Stopping eventually and raising hands above my head in clear surrender I was struck by Dep. Nave and Dep. Bryant vehicles. Officer Green and H. Santos busted out my windows and apprehended me by beating me to the ground and "Dog piling" on me with multiple officers. I was then tased by Dep. Nave, Dep. Loftis, & H. Santos with individual tasers at the same time which resulted in unconsciousness and subsequent trip to Tennova Hospital with multiple injuries. By Dep. Bryant and Dep. Nave ramming

me while completely stopped and surrendering with hands raised my 8th amendment Right was violated by their excessive use of force. The unnecessary violence used by officer Geren in breaking my window and dragging and striking me and piling upon me also specifically violated the right of the 8th amendment by use of excessive force. Lt. Santos, Dep. Loftis, & Dep. Nave deploying tasers at the same time despite already controlled constituted a gross violation of my 8th Amendment Right by their use of excessive force while under the color of state law. These facts are supported by multiple video's on facebook, youtube, and Bradley Co. Sheriff's office video, Taser supervisory use report, Narratives and incident reports, and officer testimony in Court 1/7/2019, and medical ER records.

Due to number of officers involved with arrest and subsequent abuse I will name all involved and allow video and other evidence to indicate their level of involvement if it please the court.

V. RELIEF

(State BRIEFLY exactly what you want this Court to do for you. Make NO legal arguments.

Cite NO cases or statutes.)

Hold the individuals accountable for their violations of my rights to the extent of the law. Investigate, charge, and bring to Justice all parties responsible in a timely manner.

I (We) hereby certify under penalty of perjury that the above complaint is true to the best of my (our) information, knowledge and belief.

Signed this 21 day of November, 2019.

Rach Wade Cooper
Signature of plaintiff(s)